

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**DOUGLAS I. HORNSBY, Administrator
of the Estate of CYNTHIA GARY,**

Plaintiff,

v.

Case No. 2:22-cv-427

**UNITED STATES of AMERICA,
and
METRO MACHINE CORP., d/b/a
GENERAL DYNAMICS NASSCO-NORFOLK,
and
HARBOR INDUSTRIAL SERVICES, INC.,
and
COASTAL MECHANICAL SYSTEMS, LLC,
and
ADVANCED INTEGRATED TECHNOLOGIES, LLC,
and
KD SHIPYARD REPAIRS, LLC,
and
CECO ENVIRONMENTAL CORP.,**

Defendants.

**DEFENDANT METRO MACHINE CORP. CONSENT MOTION
FOR EXTENSION OF TIME TO ANSWER PLAINTIFF’S AMENDED COMPLAINT**

Defendant Metro Machine Corp., d/b/a General Dynamics NASSCO-Norfolk (“Metro Machine”), by counsel, pursuant to Rule 6(b)(1)(B) of the Federal Rules of Civil Procedure and Local Rule 7 of of the United States District Court for the Eastern District of Virginia, hereby moves this Court to extend, to May 4, 2023, the time allowed for Metro Machine to answer Plaintiff’s Amended Complaint. The motion is filed after the expiration of the time to answer according to the return of service of the Summons and as such Metro Machine describes more fully the events that caused the excusable delay in the Memorandum in Support filed contemporaneously.

Counsel for Metro Machine communicated with Plaintiff's counsel and represents Plaintiff does not oppose the underlying motion and the relief requested. As such, no party will be prejudiced by the extension of time.

WHEREFORE, for the reasons stated herein, Defendant Metro Machine Corp., d/b/a General Dynamics NASSCO-Norfolk, respectfully moves that the requested extension of the time to answer to Plaintiff's Amended Complaint be granted and that the Court enter the attached proposed Order.

Respectfully submitted,
METRO MACHINE CORP.,
D/B/A GENERAL DYNAMICS NASSCO-
NORFOLK

By: /s/ Lynn K. Brugh, IV
Lynn K. Brugh, IV
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April 2023, I electronically filed the foregoing Motion for Extension of Time with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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